

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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JOHN DOES A, B, C, D, E, F, G, H,  
MARY DOE and MARY ROE,  
on behalf of themselves and  
all others similarly situated,

Plaintiffs,

v.

File No. 2:22-cv-10209

Hon. Mark A. Goldsmith

GRETCHEN WHITMER, Governor of the  
State of Michigan, and COL. JOSEPH  
GASPER, Director of the Michigan State  
Police, in their official capacities,

Mag. Curtis Ivy, Jr.

Defendants.

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**PLAINTIFFS' LAY WITNESS LIST**

Plaintiffs, by their attorneys, submit the following list of people who may be called at trial as lay witnesses in this matter.

1. Mary Roe<sup>1</sup>  
c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506
2. Mary Doe  
c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260

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<sup>1</sup> Pursuant to the protective order, ECF 88, the named plaintiffs, class members and their family members are identified by their pseudonyms.

Grand Rapids, MI 49506

3. John Doe A  
c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506
4. John Doe B  
c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506
5. John Doe C  
c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506
6. John Doe D  
c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506
7. John Doe E  
c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506
8. John Doe F  
c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506

9. John Doe G  
c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506
10. John Doe H  
c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506
11. I.G., Spouse of John Doe C  
c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506
12. B.W., Mother of John Doe E  
c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506
13. Michigan State Police Sex Offender Registry Unit staff and former staff,  
including but not limited to Narcissa Morris  
Michigan State Police Headquarters  
333 S. Grand Ave.  
P.O. Box 30634  
Lansing, MI 48909-0634
14. Corey Spickler  
c/o counsel  
Michigan Department of Attorney General  
P.O. Box 30217  
Lansing, MI 48909

15. James Kissinger  
c/o counsel  
Michigan Department of Attorney General  
P.O. Box 30217  
Lansing, MI 48909
16. Giancarlo Guzman  
ACLU of Michigan  
2966 Woodward Ave.  
Detroit, MI 48201
17. Shelli Weisberg  
ACLU of Michigan  
2966 Woodward Ave.  
Detroit, MI 48201
18. The Honorable William C. Buhl  
c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506
19. Senator Jeffrey Irwin  
Post Office Box 30036  
Lansing, MI 48909-7536
20. Professor Larry Dubin  
University of Detroit – Mercy School of Law  
651 E. Jefferson Ave.  
Detroit, MI 48226-4349
21. A.C.  
c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506

22. H.C.

c/o counsel

American Civil Liberties Union Fund of Michigan

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23. P.F.

c/o counsel

American Civil Liberties Union Fund of Michigan

1514 Wealthy SE, Suite 260

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24. R.H.

c/o counsel

American Civil Liberties Union Fund of Michigan

1514 Wealthy SE, Suite 260

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25. R.H.2.

c/o counsel

American Civil Liberties Union Fund of Michigan

1514 Wealthy SE, Suite 260

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26. A.J.

c/o counsel

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27. D.K.

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28. R.L.

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29. H.M.

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30. D.M.

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31. J.M.

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32. K.M.

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33. K.N.

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34. G.O.

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1514 Wealthy SE, Suite 260

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35. T.P.

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American Civil Liberties Union Fund of Michigan

1514 Wealthy SE, Suite 260

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36. B.P.

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37. M.R.

c/o counsel

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1514 Wealthy SE, Suite 260

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38. T.R.

c/o counsel

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39. J.S.

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40. A.S.

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41. K.S.

c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
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42. E.S.

c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
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43. G.W.

c/o counsel  
American Civil Liberties Union Fund of Michigan  
1514 Wealthy SE, Suite 260  
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44. K.W.

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1514 Wealthy SE, Suite 260  
Grand Rapids, MI 49506

45. All witnesses identified by Defendants.

46. Any person that provides an affidavit or declaration in this case.

47. All witnesses needed to lay a foundation.

48. All necessary records custodians and witnesses who can provide testimony to authenticate and admit exhibits.



49. All witnesses needed for rebuttal.

50. Any witness that may be ascertained through discovery or investigation.

Plaintiffs reserve the right to amend this list as discovery is completed, up to and including the day of trial.

This witness list is intended to supplement Plaintiffs' initial disclosures under Rule 26.

Respectfully submitted,

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Dated: March 21, 2023

s/ Paul D. Reingold (P27594)  
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s/ Roshna Bala Keen (Ill. 6284469)  
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